

**UNITED STATES DISTRICT COURT**  
for the  
Eastern District of Michigan

United States of America  
v.

Sandeep Singh and  
Karanpreet Singh

Case: 2:21-mj-30536  
Judge: Unassigned,  
Case No. Filed: 11-11-2021 At 03:12 PM  
USA v. (1)SANDEEP SINGH, (2)  
KARANPREET SINGH (CMP)(MLW)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 11, 2021 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*  
21 United States Code, Section 841(a)(1)

*Offense Description*  
Possession with intent to distribute controlled substances

This criminal complaint is based on these facts:  
See attached affidavit in support

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: November 11, 2021

City and state: Detroit, Michigan

*E. A. LaVigne*

*Complainant's signature*

HSI Special Agent Edward A. LaVigne

*Printed name and title*

*Anthony P. Patti*

*Judge's signature*

Honorable Anthony P. Patti, US Magistrate Judge

*Printed name and title*

AFFIDAVIT

I, Edward La Vigne, being duly sworn, depose and state the following:

- 1) I am a Special Agent (SA) with the United States Department of Homeland Security, Immigration and Customs Enforcement (ICE) Homeland Security Investigations (HSI) in Detroit, Michigan, which is located in the Eastern District of Michigan. I have over 17 years of federal law enforcement experience, and over ten years relating to border enforcement activities. During my tenure with the Department of Homeland Security, I have conducted numerous investigations relating to money laundering, contraband smuggling, and drug distribution. The following information is based upon my own investigation and previous experiences, as well as investigations conducted by fellow law enforcement officers and their previous experiences.
- 2) I have personally participated in the investigation set forth below. I am familiar with the facts and circumstances of the investigation through my personal participation, from discussions with other law enforcement officers and agents, from my discussions with witnesses and the suspects involved in the investigation, and from my review of records and reports relating to the investigation. I have not included details of every aspect of the investigation.

FACTS AND CIRCUMSTANCES IN SUPPORT OF PROBABLE CAUSE:

- 3) On November 11, 2021, Customs and Border Protection Officers (CBPO)

contacted the Homeland Security Investigations (HSI) on call Special Agent (SA) Andre Young regarding the outbound Customs inspection of commercial truck drivers Sandeep SINGH, and Karandeep SINGH, both Canadian permanent residents. SA Young in turn contacted the HSI Detroit Narcotics Group to refer the information. HSI Detroit Special Agent Edward (Ted) La Vigne was contacted by the supervisor and responded to the scene.

- 4) According to CBP Officers, S. SINGH attempted to drive his commercial truck with attached commercial trailer from Detroit, Michigan to Windsor, Canada via the Detroit Ambassador Bridge at approximately 11:20 PM on Wednesday, November 10, 2021. CBPOs stated the truck operated by K. SINGH was selected for random inspection after entering the outbound plaza of the Detroit Ambassador bridge.
- 5) During this outbound Customs inspection, a CBP Officer contacted S. SINGH (driver) and K. SINGH (passenger). CBPO's asked K. SINGH where they were coming from and what they were transporting in the truck. K. SINGH responded, "California with broccoli." CBPOs asked S. SINGH what commercial trucking company they worked for, and they both (S. SINGH and K. SINGH) responded they worked for Pride Group, a commercial trucking company based in Brampton, Ontario. CBPO's asked both S. SINGH and K. SINGH if they had had any firearms, narcotics, or U.S. currency over

\$10,000.00. S. SINGH and K. SINGH each gave a negative response to the question indicating they didn't have any of the objects or materials inquired about by CBPO's.

- 6) At that time CBPO's referred the truck for further inspection. S. SINGH parked the truck, and both he and K. SINGH were asked to exit the vehicle so that CBPO's could conduct a full inspection of the vehicle's cab. CBPO's again asked S. SINGH and K. SINGH if they had any firearms, narcotics, or U.S. currency over \$10,000, and again both responded they did not. CBPO's have authority to inspect commercial cargo entering and departing the United States. CBPO's entered the cab of the truck and began their inspection. During the inspection CBPO's lifted the bottom bunk in the sleeping area of the truck, and immediately noticed vacuum sealed bags with what appeared to be a white "crystal" substance.
- 7) A CBPO K-9 handler and his K-9 were dispatched to the truck to conduct further inspections. The K-9 was walked around the truck and indicated to the presence of narcotics in the cab of the truck. The K-9 then entered the truck and alerted to the presence of narcotics under the bunk bed in the truck's cab. The truck was then moved to a loading dock at the CBP facility where the white "crystal" material was field tested and returned positive results for "d-Methamphetamine hydrochloride." CBPO's removed approximately 45 bags

containing the white “crystal” material from under the bottom bunk in the sleeping compartment. CBPO’s field-tested eight additional packages of the material and all of them returned positive results for “d-Methamphetamine hydrochloride.”

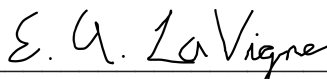
- 8) On November 11, 2021 HSI SA La Vigne responded to the Detroit Ambassador Bridge and reviewed items seized by CBP Officers. This review disclosed approximately 45 vacuum sealed plastic bags with an approximate weight of 93.75 kilograms which is consistent with large-scale drug smuggling/distribution. SA La Vigne is aware based upon experience that 93 kilograms of suspected Methamphetamine has an estimated retail value of approximately \$1,400,000.00 in the Toronto, Canada areas. SA La Vigne is aware through prior investigations, that commercial truck drivers are actively involved in smuggling methamphetamine from the U.S. into Canada and are paid approximately \$500 - \$750 per kilogram smuggled. SA La Vigne is also aware that commercial truck drivers involved with methamphetamine smuggling typically receive under 40 kilograms to smuggle per occasion, unless they have completed multiple successful smuggling ventures.
- 9) On November 11, 2021, a biographical questionnaire was conducted on S. SINGH. After the questionnaire was completed, S. SINGH received his Miranda warnings from HSI Special Agents. S. SINGH affirmed his right to

counsel and questioning was ceased at that time. HSI SA's as well as CBPO's observed at no time did S. SINGH ever ask why he was being detained, how long he would be held, or any questions at all pertaining to his detention. This behavior is extremely odd, as subjects detained for various reasons at the bridge often inquire as to why they are being held, what they did wrong, and when they'll be free to leave.


- 10) On November 11, 2021, a biographical questionnaire was conducted on K. SINGH. After the questionnaire was completed, K. SINGH received his Miranda warnings from HSI Special Agents. K. SINGH affirmed his right to counsel and questioning was ceased at that time. During the review of K. SINGH's biographical questionnaire, K. SINGH began to shake or shiver uncontrollably, and his voice was quivering. K. SINGH also had a very difficult time responding to basic questions in regard to his biographical questionnaire. His mouth was very dry and he had a hard time speaking at times. Based on my experience in interviewing subjects for approximately twenty years, this behavior is common with individuals that are under extreme stress or duress. Additionally, like S. SINGH, at no time did K. SINGH ever ask why he was being detained, how long he would be held, nor did he ask any questions at all pertaining to his detention. This behavior is extremely odd, as subjects detained for various reasons at the bridge often

inquire as to why they are being held, what they did wrong, and when they'll be free to leave.

- 11) SA La Vigne is aware that this criminal conduct occurred within the Eastern District of Michigan and based upon my training and experience, the drug amount seized is an amount consistent with large scale narcotics distribution.
- 12) Based on the foregoing, there is probable cause to believe that Sandeep SINGH, and Karanpreet SINGH violated 21 United States Code, Section 841(a)(1).

  
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Special Agent Edward La Vigne  
U.S. Department of Homeland Security  
Homeland Security Investigations

Sworn to and subscribed before me in person or  
by other, reliable electronic means.

  
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Honorable Anthony P. Patti  
United States Magistrate Judge

Dated: November 11, 2021